

## DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento CA 95814



July 27, 1992

ALL COUNTY INFORMATION NOTICE NO. I-36-92

TO: COUNTY WELFARE DIRECTORS

REASON FOR THIS TRANSMITTAL

- |  |
|--|
| <input type="checkbox"/> State Law Change                                |
| <input type="checkbox"/> Federal Law Change                              |
| <input type="checkbox"/> Court Order or Settlement Agreement             |
| <input type="checkbox"/> Clarification Requested by One or More Counties |
| <input checked="" type="checkbox"/> Initiated by SDSS                    |

SUBJECT: FOOD STAMP CORRECTIVE ACTION PLAN

Attached for your information is a copy of California's 1991 Federal Fiscal Year (FFY) Food Stamp Corrective Action Plan which was sent to the Food and Nutrition Service (FNS) as required by Federal regulations.

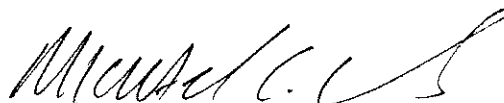
State original error rate (SOER) findings of quality control (QC) payment errors for the 1991 FFY (October 1990 through September 1991) are presented in this Plan. The emphasis is on the last six months review period of April through September 1991. The SOER for the first six months (October 1990 through March 1991) of the 1991 FFY, including issuances to ineligible, overissuances and underissuances, was 10.1 percent and for the second six months (April 1991 through September 1991) was 9.7 percent.

QC case reviews done by the State are rereviewed by Federal QC reviewers to produce an official Final Federal Error Rate (FFER). The Food Stamp program FFER for the 1991 FFY was 10.36 percent. While this was a significant reduction from the 11.64 percent FFER for the 1990 FFY, we again exceeded the Federal tolerance level and will be subject to a fiscal sanction. The 1991 FFY Federal tolerance level, consisting of the national average error rate plus a one percent forgiveness factor, was 10.31 percent. The five one hundredths percent excess payment error level represented by our 10.36 percent error rate makes California subject to a \$653,305 Federal sanction.

In addition to an error rate data analysis, Part I of the Plan provides an overview of State level error reduction activities. Part II discusses County level accuracy improvement efforts. It includes error rate data for the 34 largest counties and an overview of County level error reduction efforts. This data shows that 24 of these 34 counties had error rates below the most recent Federal tolerance level of 10.31 percent.

We appreciate the hard work and attention you have directed toward accuracy improvement in the Food Stamp program and congratulate you for the significant improvement in the 1991 FFY statewide Food Stamp error rate. We will make every effort to assist you in bringing Food Stamp error rates below sanctionable levels and maintaining them at a low level.

If you have any comments or questions about this Plan, please contact Ron Thoreson, Chief, Operations Improvement Bureau at (916) 445-2154.



MICHAEL C. GENEST  
Deputy Director  
Welfare Programs Division

Attachment

cc: CWDA

FOOD STAMP PROGRAM  
CORRECTIVE ACTION PLAN  
APRIL - SEPTEMBER 1991

STATE OF CALIFORNIA  
DEPARTMENT OF SOCIAL SERVICES

MAY 1992

## INTRODUCTION

In accordance with Code 7 of Federal Regulations 275.17, this document provides to the Food and Nutrition Service (FNS) California's Corrective Action Plan (CAP) for reducing errors in the Food Stamp Program.

The CAP is in two parts. Part I consists of error rate data analysis of the Federal quality control (QC) sample for the review period of April through September 1991. This part also provides an overview of current State level accuracy improvement activities.

Part II reports on County level corrective action. It consists of error rate data analysis based on results of the QC reviews conducted by Counties and an overview of County level accuracy improvement efforts. This overview summarizes the broad range of activities occurring in the 34 QC Counties; details of specific County error reduction activities can be found in the individual corrective action plans submitted to the State Department of Social Services (SDSS) by the Counties every six months.

The section on intensive focus Counties previously found in Part II of this report has been deleted. Intensive activities with the three designated Counties (Los Angeles, San Diego and Fresno) have been redirected to the "Seven County Partnership Effort" which is described under Corrective Action S-46-QC in Part I, Section 4.

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PART I

STATE LEVEL ACCURACY IMPROVEMENT

## 1. ERROR RATE DATA ANALYSIS

For the April through September 1991 review period, California's cumulative payment error rate (CPER) which includes issuances to ineligible, overissuances, and underissuances was 9.7 percent (see Chart 2). This CPER is .4 percentage points lower than the CPER for the previous period. The case error rate showed an increase from 26.5 percent for the previous period to 27.0 percent for the current period (see Chart 1).

During the April through September 1991 review period, the ineligible/overissuance component of the CPER decreased .3 percentage points from 6.5 to 6.2 percent (see Chart 3). The underissuance component decreased slightly this review period from 3.6 to 3.5 percent (see Chart 4).

The error rate findings for the April through September 1991 review period are based on a sample size of 678 cases. The average monthly caseload subject to review during this period was 846,898 cases.

California's 9.7 percent CPER is 1.9 percentage points below the current Federal tolerance level of 10.8 percent based on national performance for Federal Fiscal Year (FFY) 1990.

For purposes of comparison, Chart 6 displays CPER error element concentrations for the current review period of April through September 1991. Chart 5 displays this information for the previous review period of October 1990 through March 1991. For the current period, the leading cause of dollar errors for the CPER was Wages and Salaries followed by Shelter Deduction. For the last three review periods, the top three error elements were Wages and Salaries, Shelter Deduction, and Living Arrangement and Household Composition. Together these error elements accounted for approximately 60 percent of all misspent funds (57.6 and 61.0 percent, respectively) during these two periods.

As noted in our prior CAPs, Shelter Deduction errors have become increasingly problematic for California Counties. For the current period, it was the second leading cause of errors for the cumulative error rate. However, the error rate for this element has decreased in all payment error categories: the cumulative error rate decreased from 21.76 to 19.11 percent, the overissuance/ineligible rate decreased from 13.74 to 13.66 percent, and the underissuance rate decreased from 37.06 to 28.90 percent. We hope these error rates will continue to decrease.

We previously implemented a corrective action to assist Counties with Shelter Deduction errors. The action, dissemination of error reduction products targeted specifically at Shelter Deduction errors, is described under Corrective Action S-45-QC in Section 4, Part I.

PA - GA Benefits was the fourth leading cause of errors in the current period with Unemployment Compensation and Standard Utility Allowance ranking as fifth and sixth.

Chart 7 displays error element concentrations for the ineligible/overissuance component of the CPER. For this component, Wages and Salaries was again the leading cause of errors. Chart 8 displays comparable information for the underissuance component. For this component, the top error element was, as last quarter, Shelter Deduction. Charts 9, 10, and 11 display in pie charts the top error elements for the current review period for the cumulative rate, the ineligible/overissuances component, and for underissuances.

Chart 12 provides agency and client error cause information for dollar and case error rates. Client caused errors were responsible for 46.4 percent of ineligible/overissuance dollar errors, but only 14.6 percent of the underissuance dollar errors. We believe the comparably low percentage of client caused underissuance dollar errors is due, in part, to the reluctance of clients to report changes that will result in decreased benefits.

Chart 12 shows that agency caused errors increased during the April through September 1991 period from 60.5 to 65.0 percent for the cumulative rate. They also increased for the overissuance/ineligible component, from 47.1 to 53.6 percent. For the underissuance component, agency caused errors increased from 84.2 to 85.4 percent.

Chart 13 provides a breakdown of agency and client causes for both case and dollar errors for the current period. As noted in Chart 12, agency caused errors accounted for 65.0 percent of all dollar errors. The largest cause of agency errors was Failure to Take Action, accounting for 44.4 percent of all dollar errors, an increase from 38.9 percent during the previous period. The Operations Improvement Bureau has been considering ways to reduce Agency Failure to Take Action errors as part of Corrective Action S-42-QC, described in Section 4, Part I.

Chart 14 displays negative error rate information. The negative error rate for the April through September 1991 review period was 6.3 percent. This is a decrease from the 6.9 negative error rate for the previous period of October 1990 through March 1991, and a significant 1.7 percentage point decrease from the 8.3 percent reported for the October 1989 through September 1990 period. We are pleased that this error rate has continued to drop.



# CHART 1

## FOOD STAMP PAYMENT AND CASE ERROR RATES ORIGINAL STATE FINDINGS

### Combined Ineligibles and Overissuances

<u>Period</u>	<u>Payment Error</u>	<u>Case Error</u>
April 1987 - September 1987	8.1	14.5
October 1987 - March 1988	6.4	12.5
April 1988 - September 1988	7.1	14.5
October 1988 - March 1989	7.6	14.5
April 1989 - September 1989	7.0	14.5
October 1989 - March 1990	6.7	14.8
April 1990 - September 1990	8.6	16.0
October 1990 - March 1991	6.5	14.3
April 1991 - September 1991	6.2	15.3

### Combined Ineligibles, Overissuances and Underissuances

	<u>Payment Error</u>	<u>Case Error</u>
April 1987 - September 1987	12.3	23.9
October 1987 - March 1988	11.5	24.3
April 1988 - September 1988	10.8	25.3
October 1988 - March 1989	11.0	25.9
April 1989 - September 1989	10.9	26.6
October 1989 - March 1990	10.9	28.2
April 1990 - September 1990	12.6	28.8
October 1990 - March 1991	10.1	26.5
April 1991 - September 1991	9.7	27.0

**CHART 2**  
**FOOD STAMP**  
**PAYMENT ERROR RATE TREND**  
**ORIGINAL STATE FINDINGS**  
**FOR INELIGIBLES, OVERISSUANCES AND UNDERISSUANCES**

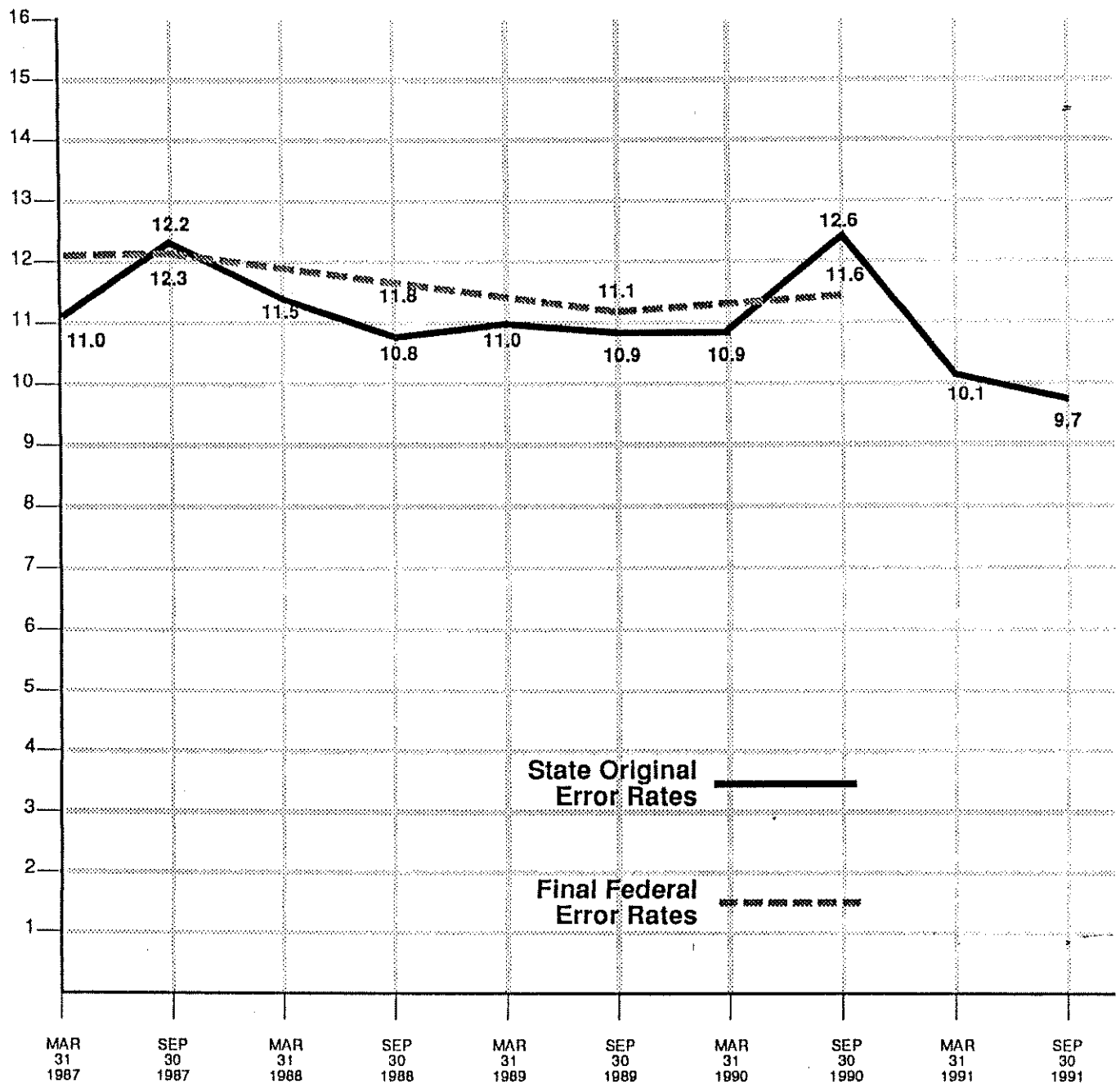
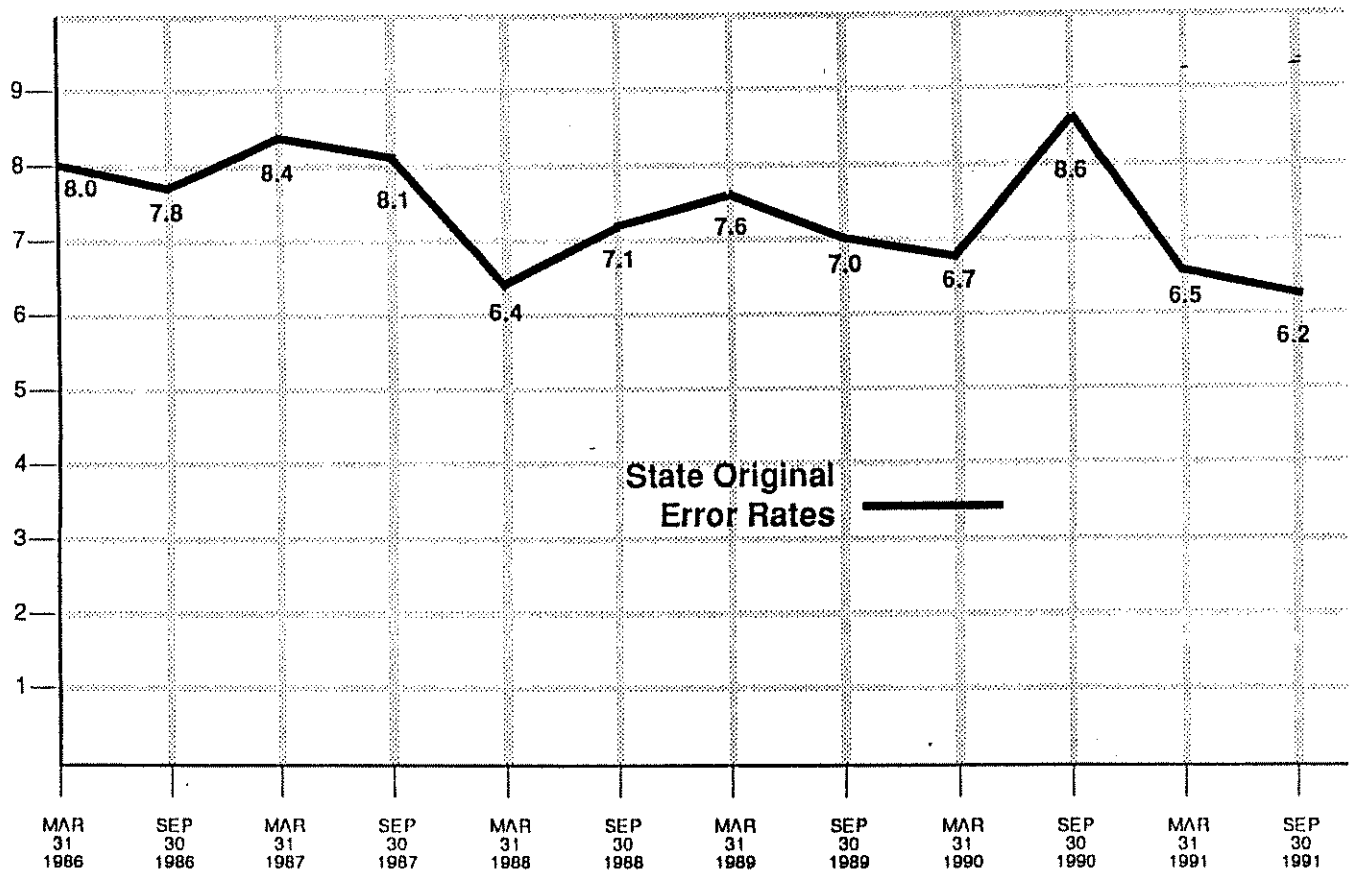


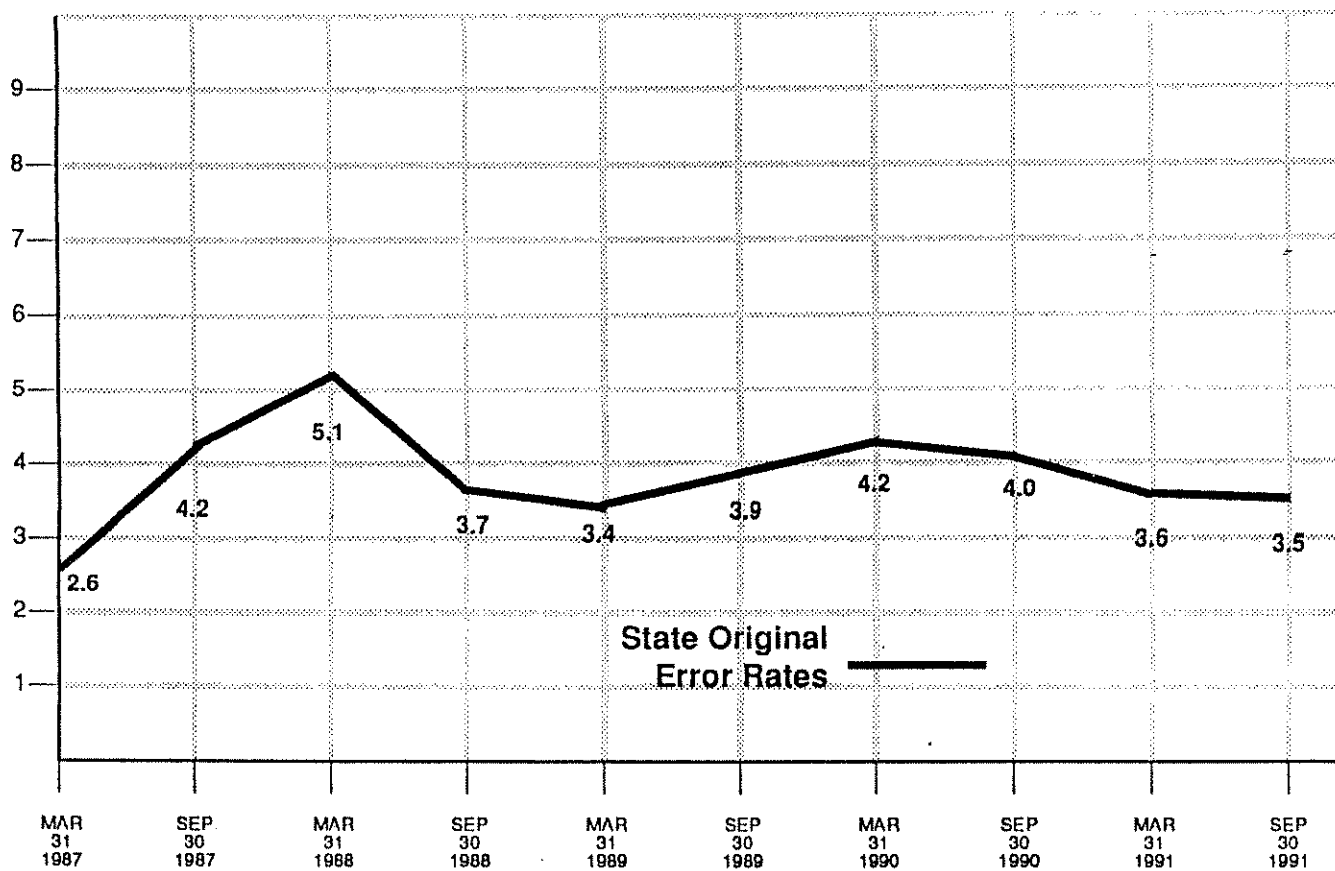
CHART 3  
FOOD STAMP  
PAYMENT ERROR RATE TREND  
ORIGINAL STATE FINDINGS  
FOR INELIGIBLES AND OVERISSUANCES

PERCENT



**CHART 4**  
**FOOD STAMP**  
**PAYMENT ERROR RATE TREND**  
**ORIGINAL STATE FINDINGS**  
**FOR UNDERISSUANCES**

PERCENT



# CHART 5

## FOOD STAMP

### ERROR CONCENTRATIONS FOR OVERISSUANCES, INELIGIBLES, AND UNDERISSUANCES October 1990 - March 1991

Error Element	Percent of Total Misspent Dollars*	Payment Error Rate*	Projected Annual Cost
1. Shelter Deduction (363)	21.76%	2.20%	\$21,178,173
2. Wages and Salaries (311)	19.76	2.00	19,231,650
3. Living Arrangement and Household Composition (150)	19.52	1.98	18,998,067
4. Unemployment Compensation (334)	7.67	0.78	7,464,917
5. PA or GA Benefits (344)	5.12	0.52	4,983,100
6. Standard Utility Allowance (364)	4.10	0.41	3,990,373
7. RSDI Benefits (331)	4.03	0.41	3,922,244
8. Contributions/Income In Kind (342)	3.42	0.35	3,328,555
9. Educational Grants/ Scholarships/Loans (345)	3.01	0.30	2,929,517
10. Arithmetic Computation (520)	1.78	0.18	1,732,406
11. Vehicles (222)	1.40	0.14	1,362,566
12. Self-Employment (312)	1.36	0.14	1,323,436
13. Bank Accounts or Cash (211)	1.25	0.13	1,216,577
14. Work/WIN Registration (160)	1.25	0.13	1,216,577
15. Citizenship and Alienage (130)	1.10	0.11	1,070,588
16. Workers Compensation (335)	1.10	0.11	1,070,588
17. Child or Dependent Care (323)	1.02	0.10	992,727
18. Age and School Attendance (110)	0.95	0.10	924,599
19. Support Payments Made to Child Support Agency (350)	0.28	0.03	272,513
20. Other Unearned Income (346)	0.12	0.01	116,791
	-----	-----	-----
	100.00%	10.12%	\$97,326,163

\*Percents may not add to totals due to rounding.

## CHART 6

## FOOD STAMP

ERROR CONCENTRATIONS  
FOR OVERISSUANCES, INELIGIBLES, AND UNDERISSUANCES  
April - September 1991

Error Element	Percent of Total Misspent Dollars*	Payment Error Rate*	Projected Annual Cost
1. Wages and Salaries (311)	21.34%	2.07%	\$27,484,137
2. Shelter Deduction (363)	19.11	1.85	24,608,516
3. Living Arrangement and Household Composition (150)	17.18	1.67	22,123,198
4. PA or GA Benefits (344)	9.74	0.94	12,537,674
5. Unemployment Compensation (334)	8.13	0.79	10,472,997
6. Standard Utility Allowance (364)	4.02	0.39	5,176,674
7. RSDI Benefits (331)	3.13	0.30	4,024,623
8. Child or Dependent Care (323)	2.93	0.28	3,770,279
9. Educational Grants/ Scholarships/Loans (345)	2.74	0.27	3,528,380
10. Contributions/Income In Kind (342)	2.60	0.25	3,351,359
11. Deemed Income (343)	2.03	0.20	2,614,091
12. Other Government Benefits (335)	1.77	0.17	2,274,137
13. Citizenship and Alienage (130)	1.64	0.16	2,109,561
14. Residency (140)	1.22	0.12	1,570,950
15. Other Earned Income (346)	0.81	0.08	1,047,300
16. Combined Net Income (372)	0.58	0.06	748,071
17. Combined Gross Income (371)	0.43	0.04	553,573
18. Self-Employment (312)	0.36	0.03	463,804
19. Other	0.24	0.02	314,190
	100.00%	9.70%	\$128,768,665

\*Percents may not add to totals due to rounding.

# CHART 7

## FOOD STAMP

### ERROR CONCENTRATIONS FOR OVERISSUANCES AND INELIGIBLES April 1991 - September 1991

Error Element	Percent of Total Misspent Dollarsx	Payment Error Ratex	Projected Annual Cost
1. Wages and Salaries (311)	27.42X	1.70X	\$22,677,009
2. Living Arrangement and Household Composition (150)	14.44	0.90	\$11,942,232
3. Shelter Deduction (363)	13.66	0.85	11,297,153
4. PA or GA Benefits (344)	13.42	0.83	11,098,667
5. Unemployment Compensation (334)	7.38	0.46	6,103,440
6. Educational Grants/ Scholarships/Loans (345)	4.12	0.26	3,407,341
7. RSDI Benefits (331)	4.09	0.25	3,381,106
8. Contributions/Income In Kind (342)	3.75	0.23	3,101,341
9. Deemed Income (343)	2.82	0.17	2,332,209
10. Child or Dependent Care (323)	2.10	0.13	1,736,751
11. Residency (140)	1.90	0.12	1,571,346
12. Other Earned Income (346)	1.27	0.08	1,050,321
13. Standard Utility Allowance (364)	1.25	0.08	1,033,780
14. Other Government Benefits (336)	0.99	0.06	818,754
15. Combined gross Income (371)	0.67	0.04	554,106
16. Other	0.38	0.02	314,269
17. Self-Employment (312)	0.34	0.02	281,188
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	100.00X	6.20X	\$82,702,439

xPercents may not add to totals due to rounding.

## CHART 8

## FOOD STAMP

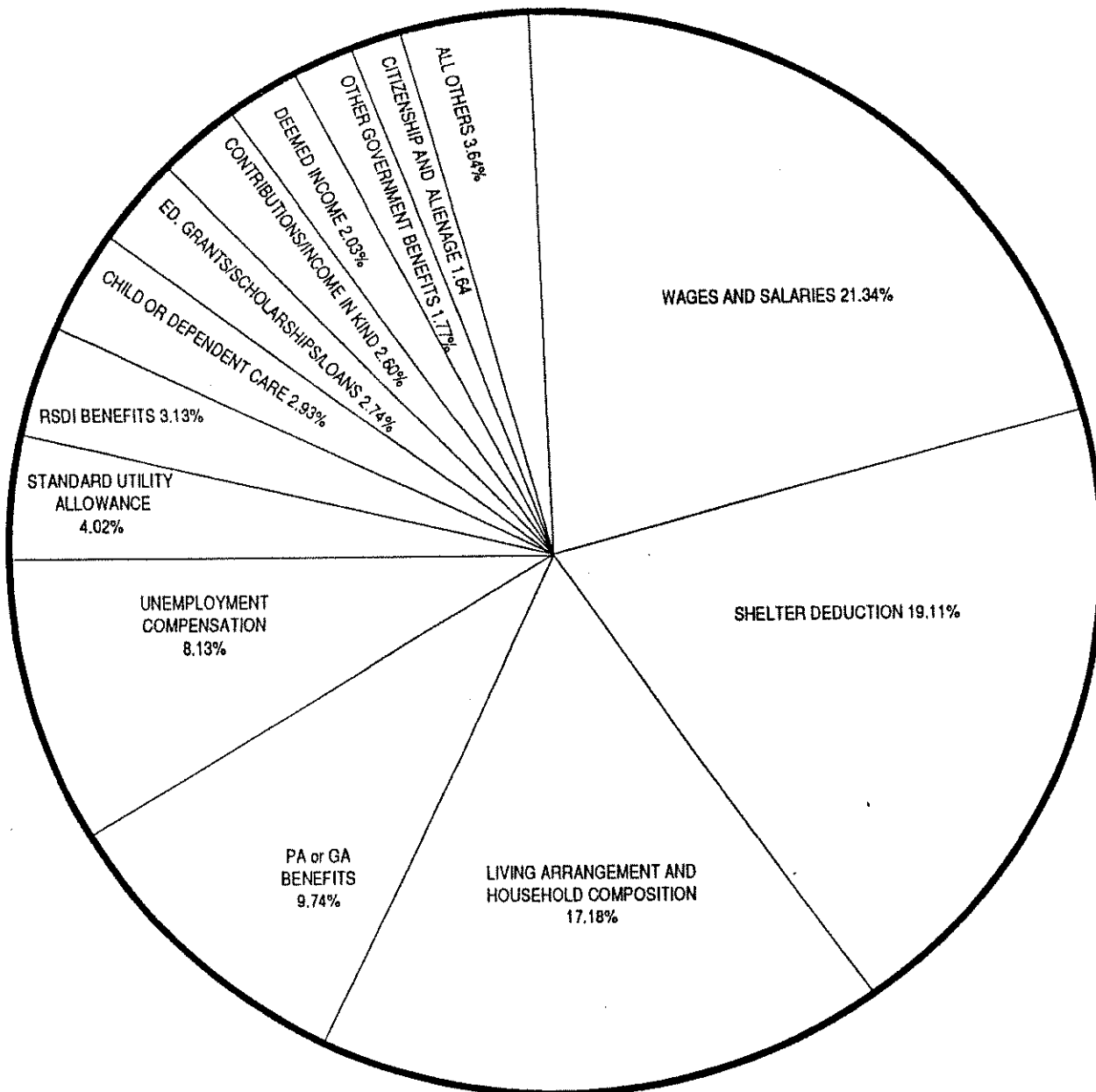
ERROR CONCENTRATIONS  
FOR UNDERISSUANCES  
April 1991 - September 1991

Error Element	Percent of Total Misspent Dollars*	Payment Error Rate*	Projected Annual Cost
1. Shelter Deduction (363)	28.90%	1.01%	\$13,313,139
2. Living Arrangement and Household Composition (150)	22.12	0.77	\$10,189,849
3. Wages and Salaries (311)	10.43	0.37	\$4,804,707
4. Unemployment Compensation (334)	9.48	0.33	\$4,367,078
5. Standard Utility Allowance (364)	8.96	0.31	\$4,127,534
6. Citizenship and Alienage (130)	4.58	0.16	\$2,109,833
7. Child or Dependent Care (323)	4.42	0.15	\$2,036,127
8. Other Government Benefits (336)	3.15	0.11	\$1,451,086
9. PA or CA Benefits (344)	3.12	0.11	\$1,437,266
10. Combined Net Income (372)	1.62	0.06	\$746,273
11. RSDI Benefits (331)	1.40	0.05	\$644,927
12. Deemed Income (343)	0.62	0.02	\$285,611
13. Contributions/Income In Kind (342)	0.55	0.02	\$253,364
14. Self-Employment (312)	0.39	0.01	\$179,658
15. Educational Grants/ Scholarships/Loans (345)	0.26	0.01	\$119,772
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	100.00%	3.50%	\$46,066,226

\*Percents may not add to totals due to rounding.



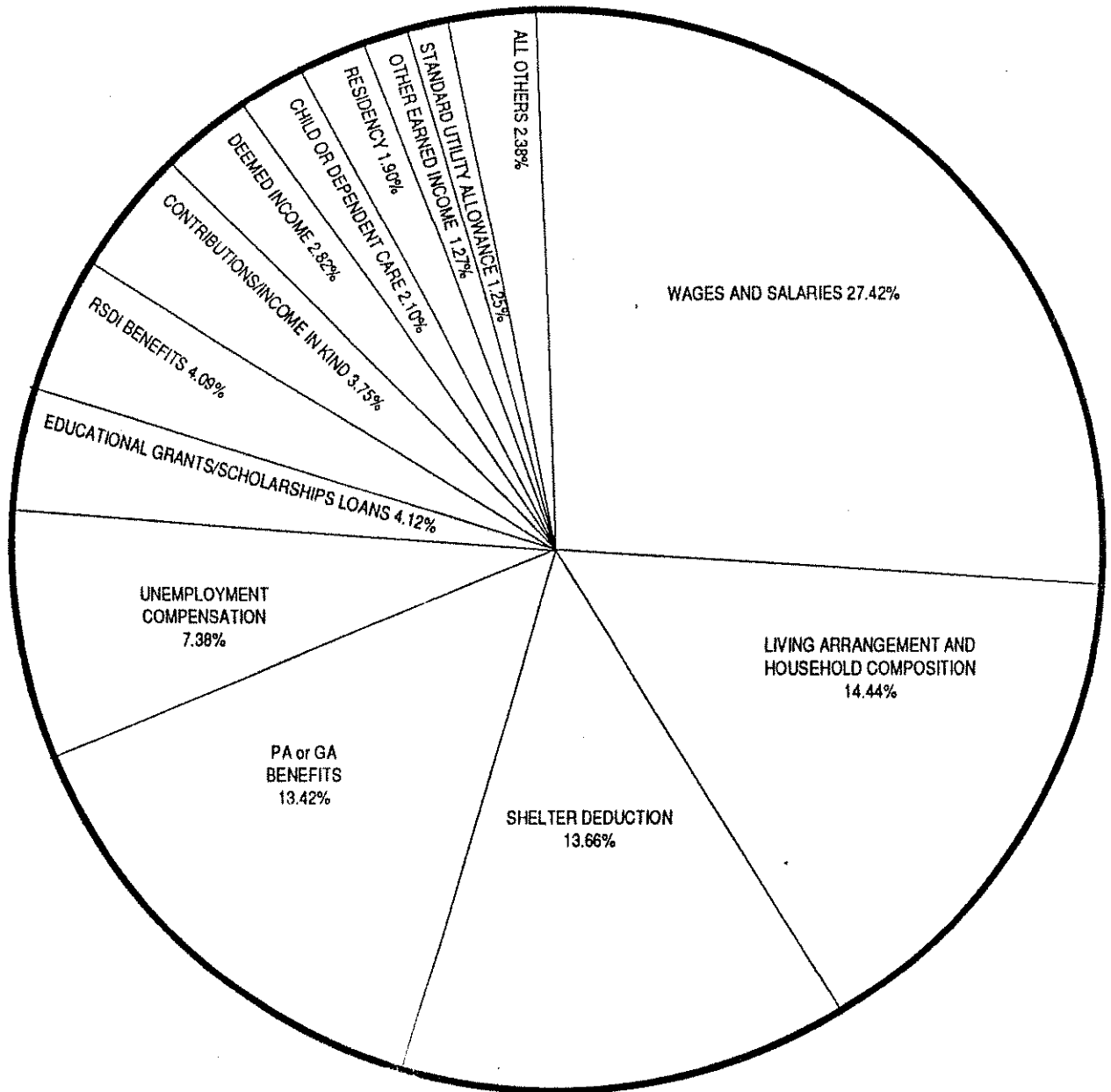
**CHART 9**  
**FOOD STAMP**  
**PERCENT OF DOLLARS IN ERROR**  
**FOR INELIGIBLES, OVERISSUANCES AND UNDERISSUANCES\***  
**APRIL - SEPTEMBER 1991**



\* Percents may not add to 10 percent due to rounding.

# CHART 10

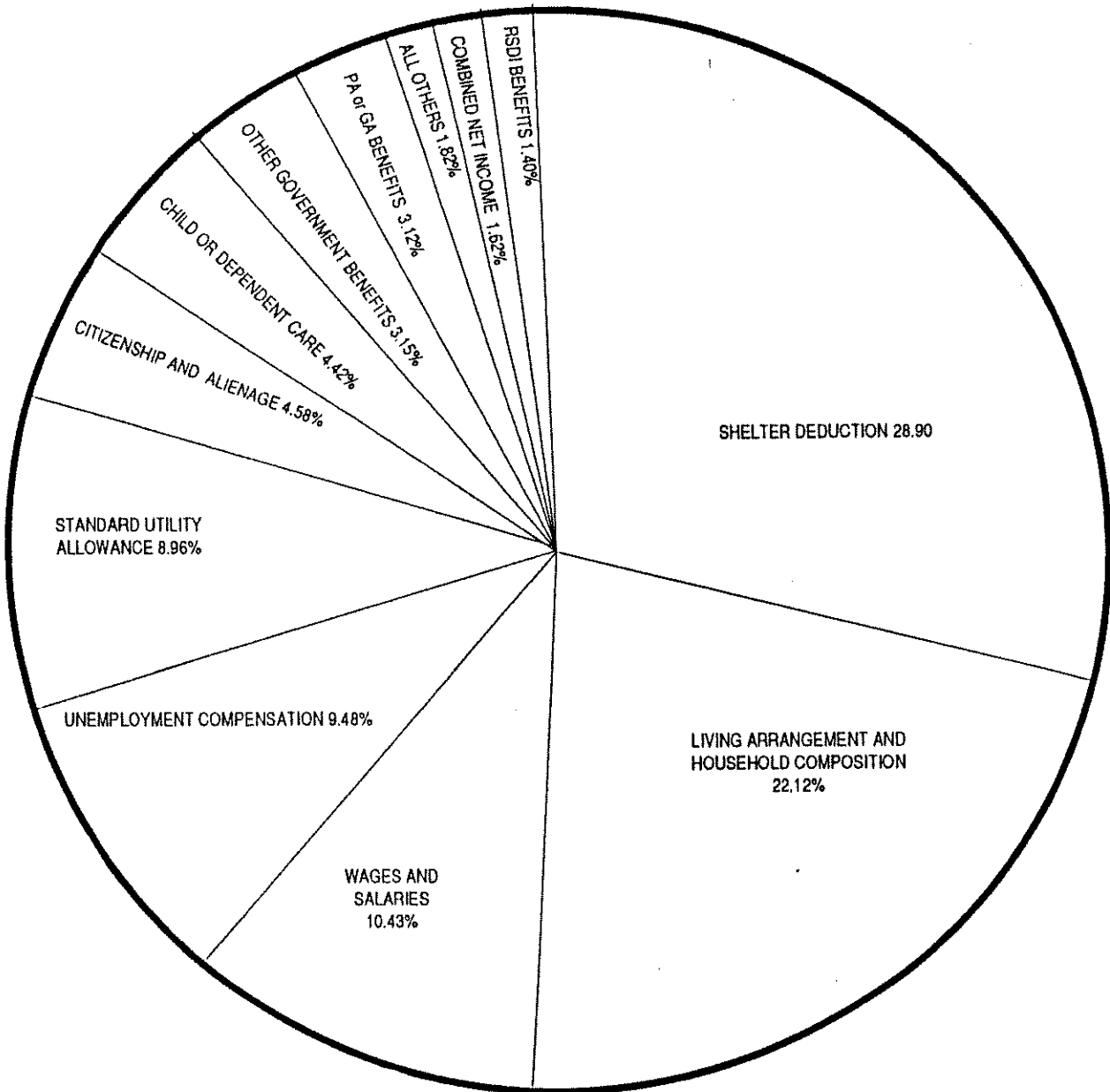
FOOD STAMP  
PERCENT OF DOLLARS IN ERROR  
FOR INELIGIBLES AND OVERISSUANCES\*  
APRIL - SEPTEMBER 1991



\* Percents may not add to 10 percent due to rounding.

CHART 11

FOOD STAMP  
PERCENT OF DOLLARS IN ERROR  
FOR UNDERISSUANCES\*  
APRIL - SEPTEMBER 1991



\* Percents may not add to 100 percent due to rounding.

# CHART 12

## FOOD STAMP CASE AND DOLLAR ERRORS AGENCY/CLIENT DISTRIBUTIONS

PERIOD: OCTOBER 1990 - MARCH 1991:

	<u>CASE ERRORS</u>	<u>DOLLAR ERRORS</u>
Ineligibles, Overissuances and Underissuances Combined	Agency: 66.9% Client: 33.1 Total: 100.0	60.5% 39.5 100.0
Ineligibles and Overissuances Combined	Agency: 54.5 Client: 45.5 Total: 100.0	47.1 52.9 100.0
Underissuances	Agency: 81.3% Client: 18.7 Total: 100.0%	84.2% 15.8 100.0%

PERIOD: APRIL 1991 - SEPTEMBER 1991:

	<u>CASE ERRORS</u>	<u>DOLLAR ERRORS</u>
Ineligibles, Overissuances and Underissuances Combined	Agency: 65.6% Client: 34.4 Total: 100.0	65.0% 35.0 100.0
Ineligibles and Overissuances Combined	Agency: 57.7 Client: 42.3 Total: 100.0	53.6 46.4 100.0
For Underissuances	Agency: 75.9 Client: 24.1 Total: 100.0%	85.4 14.6 100.0%

# CHART 13

## FOOD STAMP CASE AND DOLLAR ERRORS AGENCY/CLIENT CAUSE DISTRIBUTIONS April - September 1991

	<u>CASE ERRORS</u>	<u>DOLLAR ERRORS</u>
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FOR INELIGIBLES, OVERISSUANCES AND UNDERISSUANCES

<u>Agency Errors:</u>		
Failure to Take Action.....	44.8%	44.4%
Policy Incorrectly Applied.....	16.4	17.3
Arithmetic Computation.....	0.0	0.0
Other Agency Errors.....	4.4	3.3
Total.....	65.6	65.0
<u>Client Errors:</u>		
Information Not Reported.....	29.5	29.8
Reported Information is Not Correct.....	4.9	5.2
Total.....	34.4%	35.0%

FOR INELIGIBLES AND OVERISSUANCES

<u>Agency Errors:</u>		
Failure to Take Action.....	37.5%	36.8%
Policy Incorrectly Applied.....	16.3	15.4
Arithmetic Computation.....	0.0	0.0
Other Agency Errors.....	3.8	1.4
Total.....	57.6	53.6
<u>Client Errors:</u>		
Information Not Reported.....	34.6	14.4
Reported Information is Not Correct.....	7.7	0.2
Total.....	42.3%	14.6%

FOR UNDERISSUANCES

<u>Agency Errors:</u>		
Failure to Take Action.....	54.4%	58.1%
Policy Incorrectly Applied.....	16.5	20.6
Arithmetic Computation.....	0.0	0.0
Other Agency Errors.....	5.1	6.7
Total.....	76.0	85.4
<u>Client Errors:</u>		
Information Not Reported.....	22.8	38.4
Reported Information is Not Correct.....	1.3	8.0
Total.....	24.1%	46.4%

# CHART 14

## FOOD STAMP NEGATIVE ERROR RATE ORIGINAL STATE FINDINGS

<u>Period*</u>	<u>Error Rate</u>
October 1982 - September 1983	3.87%
October 1983 - September 1984	2.54
October 1984 - September 1985	4.43
October 1985 - September 1986	5.96
October 1986 - September 1987	9.30
October 1987 - September 1988	12.57
October 1989 - September 1990	8.30
October 1990 - September 1991	6.60

\*Federal Fiscal Year data are presented for all review periods. There is no negative error rate for FFY 1989. The negative error rate sample was discontinued during that year because California, represented by San Diego County, participated in a nationwide study of Food Stamp negative actions.

## 2. OVERVIEW OF STATE ACCURACY IMPROVEMENT ACTIVITIES

California's Food Stamp Program is administered by the Counties under the supervision of the State Department of Social Services (SDSS). Because the delivery of services takes place at the County level, the SDSS takes a different approach to accuracy improvement than would be appropriate for States that are directly responsible for program administration.

Staff of the Operations Improvement Bureau work to support, motivate, and monitor County level error reduction activities recognizing that the most effective efforts usually take place at the level of service delivery. State staff are involved in a variety of county level accuracy improvement activities as well as the development and implementation of State level corrective actions. This approach was adopted after reviewing Food Stamp Program operations in California because it was determined to be the most efficient method of mobilizing both State and County resources for effective accuracy improvement.

In this section, we provide an overview of some of the ongoing accuracy improvement activities occurring at the State level.

- o Income and Eligibility Verification System (IEVS). This system provides the Counties with a broad range of automated verification systems. The information can be used to verify eligibility and/or identify potential fraud. Computer matches verify unemployment insurance data, disability insurance data, wage information from within California and throughout the nation, Social Security benefits, unearned income from bank accounts or other investments, and duplicate aid.

This system represents an enhancement of three computer match systems that were already in place: the Integrated Earnings Clearance/Fraud Detection System which identifies unreported wages and duplicate aid for AFDC, Food Stamp and SSI/SSP recipients; the Payment Verification System which provides information on recipients who receive or will receive Retirement Survivors Disability Insurance, Unemployment Insurance or Disability Insurance; and the Asset Match System which matches the welfare recipient file against the State Franchise Tax Board's interest and dividend file.

In addition to the above matches, the SDSS has added the Systematic Alien Verification for Entitlement (SAVE) and the Homeless Assistance Program Indicator (HAPI) systems. SAVE verifies the immigration status of all aliens who apply for and/or are recipients of AFDC and Food Stamps. HAPI creates a data base of individuals who have received Homeless Assistance to prevent duplicate or improper payments.

In 1990, the information available to Counties in the area of wage and asset matching was expanded to include nationwide wages and investment income. Nationwide wage data are sent to Counties monthly from the Beneficiary Earnings Exchange Record (BEER). Information from the Internal Revenue System (IRS) asset matches, including information on out-of-state investments, are provided to Counties annually.

Effective November 1991, the applicant system added the Social Security Number validation and Title II and XVI benefit information via computer link between California and Baltimore. Currently, the SDSS is testing a pilot system for USDA Food Stamp Disqualification System. This system will be added to the other IEVS match systems when testing has been completed.

The Fraud Program Branch also conducts periodic reviews of IEVS operations in Counties to discuss IEVS related issues. Quarterly meetings are held with County IEVS coordinators. At these IEVS "user" meetings, forthcoming changes to IEVS are discussed and IEVS problems are identified. Counties provide a valuable source of input to improve the IEVS system.

- o Fraud Early Detection Program. California has long had a formal pre-eligibility fraud detection program, entitled Fraud Early Detection (FRED). The FRED Program provides for investigative personnel to be placed in direct physical access to intake units in order to provide expeditious investigative service to those units. The program is separate and parallel to the intake function and does not interfere with normal intake procedures nor delay the payment of benefits.

Prior to 1991, slightly less than half of California's Counties participated in this program. In July of 1991, legislation passed that provides for 100 percent state funding, i.e., no County costs for Counties that elected to participate. The legislation required the Counties to submit an operating plan for SDSS approval prior to the release of 100 percent funding. To date, 44 Counties have opted to participate. Two more are in the process of developing operating plans. These 46 Counties represent approximately 95 percent of California's welfare caseload.

During the period of October 1990 through September 1991 (prior to implementation of the 100 percent program), over 50,000 Food Stamp (NA and PA) applications were referred to the program; of these, approximately 24,000 were denied, reduced or withdrawn. As the average (NA and PA) Food Stamp case receives \$100.00 a month for 15 months, it is estimated that almost \$75 million in erroneous Food Stamp benefits were prevented as a result of this program.

- o Review and Evaluation Branch. Review and Evaluation Branch (REB) continues its commitment to accuracy. In June 1991, all REB staff received training in advanced analytical techniques. Topics covered included efficient data collection and analytical techniques to identify problems.

The REB trainer conducted a week's training for new analysts in August 1991. This training session covered both Food Stamp program and quality control requirements. Video tapes were also made for future training of new staff or refresher training for experienced staff. Future training sessions will cover correct coding for the Integrated Review Schedule. This session will also be videotaped.



An REB task force continues to work on ways to facilitate case processing which would allow more time, within the established timeframes for case transmission, for earlier detection and avoidance of errors. This task force should complete its work by July 1992.

- o The Accuracy Improvement Bureau Clearinghouse. The Operations Improvement Bureau encourages Counties to share information and ideas. A Clearinghouse of corrective action products and resources has been operational since 1987. The contents of the Clearinghouse represent the efforts of Counties and other entities to design products that emphasize error prevention and corrective action. These products have been effective tools for the Counties that designed them and may be of benefit to other Counties as well. Some products have also been developed in regional corrective action workshops attended by County, State, and Federal staff. In addition, the Clearinghouse serves as a vehicle for the distribution of products developed as a result of State level corrective action.

Products in the Clearinghouse are continually updated. They are classified under the following headings: AFDC Eligibility, CA-7 Processing, Case Review/Supervisory Review, Caseload Management, Choosing the Right Corrective Action, Client Caused Errors, Corrective Action Committees, Evaluation, Error-Prone Profiles/Identifying High Risk Factors, Food Stamp Eligibility, Fraud Prevention, Problem Solving, Time Management, Training, and Worker Performance Standards/Employee Expectations. The Clearinghouse Catalog also includes information on videotape availability.

Clearinghouse products are available to Counties upon request. Operations Improvement Bureau consultants are familiar with these products and recommend appropriate products to Counties.

- o Annual Statewide Accuracy Improvement Conference. From 1986 through 1990, an annual statewide conference was jointly sponsored by Federal, State and County government organizations to give welfare professionals throughout the State the opportunity to meet each other and discuss corrective action issues. Due to severe State budget constraints and the possibility of impending State layoffs in 1991, SDSS opted to cancel the annual conference. However, Accuracy Improvement Consultants continue to assist Counties in preparing and presenting regional accuracy improvement conferences.

Regional Eligibility Worker and Eligibility Supervisor Conferences. Operations Improvement Bureau staff work jointly with County staff to develop and present eligibility worker and eligibility supervisor conferences. The first regional eligibility worker conference took place in July 1988. Since that time, numerous eligibility worker and supervisor conferences have taken place at various locations throughout the State. Currently, five regional conferences occur each year. The Bay Area, Northern/Motherlode and Southern Counties regional corrective action committees each sponsor an annual eligibility worker conference. The Valley Nine Network and Southern Counties regional corrective action committees each sponsor an annual supervisors conference.

In addition, the Valley Nine Network holds eligibility worker field days with rotating host Counties three times a year. The primary objectives for these conferences and field days are to raise participant awareness of corrective action issues and to enhance networking among welfare professionals. All have been very successful.

- o Statewide Corrective Action Committee (SCAC). This committee demonstrates the priority status given to error reduction in California. Since 1984, SCAC has consisted of the Director of the SDSS and the Directors of several County Welfare Departments throughout the State. Members during this review period included Directors from Alameda, Del Norte, Madera, Los Angeles, Riverside, Solano, Trinity, and Yuba Counties. The committee meets quarterly to discuss corrective action issues. Members carry SCAC's corrective action message to their home Counties and regions. Topics discussed at SCAC meetings during this review period include FFY 91/92 corrective actions; budget changes on accuracy improvement efforts; Quality Control/Sanction Reform Legislation and regulations; FNS Food Stamp Conference; Quality Control Operations Reviews and Program Improvement, Monitoring, and Evaluation (PRIME) projects; and the Steffans court case and its implications for accuracy improvement.
- o Problem Solving Training. To assist Counties in developing the necessary problem solving skills for effective corrective action, the Operations Improvement Bureau makes several types of training sessions available to Counties.

One of these is the Nine-Step Problem Solving Workshop. This is a full day workshop designed to teach problem solving skills to supervisors, lead eligibility workers, managers and other staff directly involved in corrective action planning. Participants work in small groups to analyze problems, identify causes, and develop solutions along with implementation/evaluation plans. During this review period, the Nine-Step Workshop was presented to members of San Bernardino County's Corrective Action Committees. Also, Bureau staff trained Los Angeles County staff development trainees in conducting this workshop.

The Operations Improvement Bureau also presents a half-day workshop especially for County line staff. This workshop, Quality Control/Accuracy Improvement Awareness Training, provides eligibility workers and supervisors with information about the quality control process in their County and about skills they can use to solve problems at the unit level. This training focuses on helping line staff realize that they can make a difference in lowering California's error rate. During this review period, the Bureau presented this workshop to approximately 200 eligibility workers and supervisors in Alameda County.

Production of these and other training sessions is a cooperative effort by both State and County staff. Participants in these workshops not only enhance their problem solving skills, they also enjoy the opportunity to network and share ideas with other welfare professionals.

### 3. PLANNED CORRECTIVE ACTIONS

In State fiscal year (FY) 1991, California suffered budget constraints which impacted the SDSS and its Welfare Division. A department-wide reorganization occurred which changed reporting relationships and Bureau responsibilities. As a result, during the review period of April through September 1991, no new corrective actions were implemented. However, activity continued on several previously implemented corrective actions including the Seven County Partnership Effort described in the following section.

#### 4. STATUS OF PRIOR CORRECTIVE ACTIONS

This part of the Plan presents information on the progress of previously implemented corrective actions. They are:

- S-42-QC    Review of Action on Reported Changes
- S-44-QC    QC Error Case Correction Project
- S-45-QC    Products For Shelter Deduction Error
- S-46-QC    Seven County Partnership Effort

Number

S-42-QC

Title

Review of Action on Reported Changes

Description

Agency Failure to Take Action continues to be a major source of errors statewide. This corrective action utilizes the resources and skills of the Operations Improvement Bureau (OIB) as part of a broad-based approach to reduce Failure to Take Action errors.

The Action on Changes Module was incorporated into the Integrated Review and Improvement Studies (IRIS) in January 1991 as planned. Based on comments received from the Counties as well as OIB's preliminary assessment of the results, the information gleaned from this review should prove very helpful to both the Counties and State.

In terms of improvements to the module design itself, a review of Training has been substituted for Uncovered Caseloads beginning with FFY 1991 as the twenty County data indicates Counties have procedures in place to ensure uncovered cases are being monitored. A review of the CA-7 process as well as Supervisory Reviews are the other two systems that will continue to be examined as part of this corrective action. Since this action was developed, FNS has added a review of Action on Changes to the Federal Priority Areas for FFY 1991. We are pleased that we have an approach that has been tested and refined to meet this federal concern.

For the review period of April through September 1991, Failure to Take Action agency dollar errors increased 5.5%, from 38.9% to 44.4%. The OIB continues to review county systems through IRIS reviews. It is hoped that this module will have an eventual impact. In addition, as this area is a major source of statewide errors, the Seven-County project will also be reviewing how the large Counties are tackling this problem.

Implementation Status

Evaluate module effectiveness/  
make improvements

- Completed October 1990

Issue summary report

- Completed May 1991

Evaluate corrective action  
for impact on errors

- April 1992

Number

S-44-QC

Title

QC Error Case Correction Project

Description

Integrated Review and Improvement Studies (IRIS) conducted in FFY 1989 revealed that many Counties were not correcting error cases identified in Federal sample QC reviews. This is a serious concern. Correction of error cases is an important component of casework accuracy and an essential step to prevent additional error cites should the case be selected again for QC review.

To assist Counties in developing and implementing an effective case correction procedure, the Welfare Program Integrity Branch conducted a review in 1990 of County Welfare Departments' practices in the correction of individual case errors. The purpose of this review was to discover the constraints which may be impeding the correction of individual case errors and to identify effective procedures and monitoring systems. A report summarizing the findings and highlighting successful County practices was sent to all Counties in May 1991. Through County inquiries and other contacts with the Counties, we believe that some Counties have utilized the information that was generated to establish their own improved systems for case correction.

During the federal fiscal year, the IRIS team collected QC error correction data from 29 counties. There were a total of 182 cases identified in federal sample QC reviews which needed follow up. Of these cases, 147 cases had corrective action taken and 35 cases did not have any action taken or could not be located. In addition, the IRIS team documented county procedures for correcting these errors.

Implementation Status

Survey Counties on  
case correction  
procedures

- Completed December 1990

Analyze survey  
findings

- Completed January 1991

Conduct on-site  
analysis of case  
correction procedures  
in selected Counties

- Completed March 1991

Analyze findings and  
develop recommenda-  
tions

- Completed April 1991

Prepare report of  
findings/successful  
procedures and send  
to Counties

- Completed May 1991

Evaluate corrective  
action

- April 1992

Number

S-45-QC

Title

Products For Shelter Deduction Errors

Description

Shelter Deduction is a leading cause of California's dollar errors. During the current period, it is the second leading cause of dollar errors for ineligibles, overissuances and underissuances combined. The Operations Improvement Bureau (OIB) developed this action in 1990 to assist Counties in addressing Shelter Deduction errors. The action included reviewing Corrective Action Plans submitted by Counties for the last several review periods and drawing out products or ideas that the Counties have implemented to reduce Shelter Deduction errors. The emphasis was on those actions that the Counties felt had been effective in reducing such errors, or which were newly implemented and appeared to be appropriate for the problems they were designed to address.

Products were also gathered from the OIB Clearinghouse and from consultants' knowledge of products used in Counties as a result of assessments or other contacts with the Counties. The action also included a review of the products by the Policy Implementation Bureau to rule out obvious misinterpretations of policy inherent in the products.

As a result of these steps, the OIB compiled a written collection of fourteen products and ideas ranging from client mailers to data processing changes that alert workers to pending shelter deduction changes. This corrective action began in November 1990 with brainstorming by the Operations Improvement Bureau consultants and the resulting package was mailed to all County Corrective Action liaisons in April 1991.

This area continues to be one of the top three error elements. However, during the period of April through September 1991, the Shelter Deduction error element decreased in all payment error categories. The combined overissuance, ineligible and underissuance rate decreased from 21.76 to 19.11 percent, the ineligible and overissuance rate decreased from 13.74 to 13.66 percent, and the underissuance rate decreased from 37.06 to 28.90 percent. We hope these error rates will continue to drop.

Implementation Status

Compile County level  
corrective actions  
for Shelter Deduction

- Completed December 1990

Analyze County level



corrective actions  
for Shelter Deduction

- Completed January 1991

Select appropriate  
County products and  
ideas

- Completed February 1991

Review selected  
products/ideas for  
policy interpretation

- Completed February 1991

Prepare written  
package for mailing

- Completed March 1991

Mail written package  
to County liaisons

- Completed April 1991

Evaluate corrective  
action

- April 1992

Number

S-26-QC

Title

Seven County Partnership Effort

Description

Since FFY 1986, California's Food Stamp error rate has been above the national average and the Federal tolerance level. The Food and Nutrition Service (FNS) and the State Department of Social Services (SDSS) collaborated on a new project to reduce Food Stamp error rates in the seven largest caseload Counties in an effort to bring the Statewide error rate below the Federal tolerance level in FFY 1992.

The seven Counties which agreed to participate in this project are: Alameda, Fresno, Los Angeles, Orange, Sacramento, San Bernardino and San Diego. Three of these Counties (Los Angeles, Fresno and San Diego) had previously been designated "intensive focus" Counties by SDSS and were already receiving intensified attention by Accuracy Improvement (AIM) Consultants. Additionally, the State Fiscal Year 1992 had already been designated as the Year of Food Stamps.

An initial meeting was held in August 1991 with State, Federal and County staff to discuss ideas relevant to the group's intended purpose and its method of operation. A second meeting was held in October 1991 to generate commitment from the participating seven County Welfare Directors and to further discuss the group's purpose and methodology. A third meeting was held in February 1992 to discuss specific goals and group tasks.

All three levels have committed to short term and long term error reduction actions. These Counties committed to refocusing their energies on operations improvements and contributing to SDSS and FNS project activities. SDSS modified its IRIS schedule and scope to allow an expanded IRIS review in each of the largest seven Counties. An IRIS error reduction module has been added to focus on reducing the reviewed County's error rate and/or assess the effectiveness of corrective actions already underway and/or assess the transferability of exemplary practices into or from the reviewed County. County management collaborates with SDSS IRIS staff to prescribe the focus of the error reduction module. AIM consultants have also intensified their contacts and activities with these Counties. FNS agreed to consider all County and SDSS recommendations for review and revision of problematic Federal policies, procedures and program provisions. FNS committed to pursue program improvements within their legal or fiscal constraints.

The State's Plan will continue to report on this corrective action during the life of this project.

### Implementation Status

Compile barriers to Food Stamp Program integrity and brainstorm suggestions for eliminating/mitigating them

- Completed May 1991

Meet with seven large Counties to discuss ways to pursue above suggestions

- Completed August 1991

Meet with seven large Counties to secure commitment to project

- Completed October 1991

Meet with seven large counties to discuss specific project goals and tasks

- January 1992

All seven Counties will have an IRIS review with an error reduction module added to the normal IRIS scope. This will begin in October 1991 and continue to September 1992.

- September 1992

## 1. ERROR RATE DATA ANALYSIS

Error rates for individual Counties are displayed in Charts 15 and 16. The results of the County QC reviews for the April through September 1991 review period are shown in Chart 15. Chart 16 presents the cumulative payment error rates (CPERs) for the Counties for the last four review periods. This information assists the Operations Improvement Bureau in identifying error rate trends in the Counties and recognizing superior or improved performance.

Thirty-three Counties reported their error rates during the April through September 1991 review period. The samples for their QC reviews were randomly selected by the State Department of Social Services Quality Control Branch using the same master file which is used to draw the Federal QC sample. Because of its large caseload size, error rates for Los Angeles County are derived from its portion of the Federal sample.

A comparison of County QC review findings for the April through September 1991 period with findings for the previous period reveals that CPERs increased in 14 Counties and decreased in 19 Counties. Overall, 25 Counties (76 percent of the reporting QC Counties) had CPERs below the current Federal tolerance level of 10.8 percent.

# CHART 15

## FOOD STAMP COUNTY PAYMENT ERROR RATES FOR INELIGIBLES AND OVERISSUANCES, UNDERISSUANCES, AND CUMULATIVE APRIL - SEPTEMBER 1991

	<u>Ineligibles and Overissuances</u>	<u>Underissuances</u>	<u>Cumulative*</u>
Alameda	7.4%	2.2%	9.6%
Butte	7.3	1.5	8.8
Contra Costa	4.2	1.9	6.1
Fresno	9.3	4.1	13.4
Humboldt	5.1	1.6	6.7
Imperial	7.5	6.5	14.0
Kern	1.6	3.1	4.7
Kings	4.6	3.5	8.1
Los Angeles	4.4	5.2	9.6
Madera	4.5	3.7	8.2
Mendocino	5.8	2.9	8.7
Merced	N/A	N/A	N/A
Monterey	12.3	5.6	17.9
Orange	5.3	2.7	8.0
Placer	3.8	2.4	6.1
Riverside	2.9	3.4	6.3
Sacramento	3.0	2.9	5.9
San Bernardino	5.2	2.8	8.0
San Diego	7.5	5.0	12.5
San Francisco	8.1	2.5	10.6
San Joaquin	3.7	3.9	7.6
San Luis Obispo	8.0	4.5	12.5
San Mateo	7.9	3.4	11.3
Santa Barbara	7.0	3.4	10.4
Santa Clara	3.8	2.8	6.6
Santa Cruz	4.5	2.4	6.9
Shasta	5.3	3.2	8.5
Solano	5.3	2.4	7.8
Sonoma	3.4	2.8	6.2
Stanislaus	4.3	2.0	6.3
Tulare	8.8	4.9	13.7
Ventura	8.1	3.0	11.1
Yolo	5.7	1.8	7.5
Yuba	1.7	1.1	2.8

Data source information: Data are from the State QC sample for all Counties except Los Angeles. Los Angeles County data are from the Federal QC sample.

\* Ineligible and overissuance percentages and underissuance percentages may not add to cumulative error rates due to rounding.

N/A: Not available.

PART II

COUNTY LEVEL ACCURACY IMPROVEMENT

## CHART 16

FOOD STAMP  
COUNTY CUMULATIVE  
PAYMENT ERROR RATES

County	October 1989- March 1990	April 1990- September 1990	October 1990- March 1991	April 1991- September 1991
Alameda	8.5%	12.5%	12.1%	9.6%
Butte	11.7	7.1	11.6	8.8
Contra Costa	6.3	5.8	11.7	6.1
Fresno	15.4	12.7	14.2	13.4
Humboldt	10.6	1.0	6.6	6.7
Imperial	21.6	17.7	18.4	14.0
Kern	3.1	3.0	3.1	4.7
Kings	10.3	7.5	7.9	8.1
Los Angeles	12.0	10.5	12.9	9.6
Madera	7.7	7.3	6.5	8.2
Mendocino	17.3	16.6	10.1	8.7
Merced	8.9	N/A	N/A	N/A
Monterey	13.3	13.1	16.3	17.9
Orange	10.6	9.6	10.4	8.0
Placer	8.7	6.4	5.0	6.1
Riverside	10.3	7.8	11.4	6.3
Sacramento	4.7	8.2	6.8	5.9
San Bernardino	8.5	9.6	12.6	8.0
San Diego	15.7	14.5	13.2	12.5
San Francisco	5.8	9.0	8.3	10.6
San Joaquin	8.7	9.6	6.1	7.6
San Luis Obispo	9.5	8.2	8.9	12.5
San Mateo	15.9	14.5	8.3	11.3
Santa Barbara	10.6	7.7	12.3	10.4
Santa Clara	9.4	5.9	4.5	6.6
Santa Cruz	8.6	7.0	8.1	6.9
Shasta	13.9	7.7	5.1	8.5
Solano	11.2	6.1	6.8	7.8
Sonoma	6.4	7.3	7.4	6.2
Stanislaus	6.4	7.7	9.7	6.3
Tulare	12.4	19.4	15.9	13.7
Ventura	12.2	15.1	9.4	11.1
Yolo	7.4	7.6	9.2	7.5
Yuba	3.9	5.9	4.9	2.8

Data source information: State QC sample findings for all Counties except Los Angeles. Federal QC sample findings for Los Angeles County.

N/A: Not available.

## 2. OVERVIEW OF COUNTY ACCURACY IMPROVEMENT ACTIVITIES

As can be seen from Section 1 of Chart 17, California Counties vary a great deal in size. California has categorized its Counties based on AFDC caseload size. Large QC Counties have AFDC caseloads greater than 15,000 cases. Medium QC Counties have AFDC caseloads of approximately 4,001 to 15,000. Counties with AFDC caseloads of 1,400 to 4,000 are listed as small QC Counties on Chart 17. The remaining Counties are non-QC (self-monitoring) Counties which do not perform QC reviews. However, they do conduct supervisory case reviews, quality assurance, or other internal monitoring procedures in order to identify errors and plan corrective action.

As a major error reduction activity, California Counties prepare and submit corrective action plans to the Operations Improvement Bureau twice a year. Plans are due February 1 and August 1 of each year. These corrective action plans constitute a major part of California's error reduction efforts. We believe that because County staff are directly involved in program administration at the local level, they are best able to analyze local problems and focus available resources for effective error reduction. Information on specific actions initiated by Counties can be obtained by reviewing the corrective action plans submitted by the individual Counties.

Each County is assigned an Operations Improvement Bureau consultant who reviews and evaluates the corrective action plans submitted by his or her respective Counties and responds with detailed written comments. Consultants also communicate with their Counties through telephone contacts and in-person visits. Because the Operations Improvement Bureau recognizes that many effective error reduction activities occur at the County level, the role of the consultant is twofold: to help Counties maintain their commitment to accuracy improvement and to assist Counties in acquiring the problem solving skills and tools necessary to develop effective corrective action.

As Section 2 of Chart 17 indicates, 35 Counties had active corrective action committees during the April through September 1991 review period. A significant part of accuracy improvement activities in these Counties involves the work of the corrective action committees which typically meet monthly to identify problems, generate ideas, develop solutions and review the effectiveness of prior corrective actions. Another major activity of these committees is to generate and maintain staff motivation for error reduction and error prevention. Operations Improvement Bureau consultants frequently attend these meetings to assist Counties in their corrective action efforts.



To further assist County staff in developing the necessary skills to reduce errors, Operations Improvement Bureau consultants work jointly with County staff to present problem solving training workshops. Two training formats are utilized: Quality Control/Accuracy Improvement Awareness and the Nine-Step Problem Solving Workshop.

The Quality Control/Accuracy Improvement Awareness Training is a half-day workshop especially for County line staff. It provides them with information about the quality control process in their County and about skills they can use to solve problems at the unit level. The Nine-Step Problem Solving Workshop is a full day training session designed to teach enhanced problem solving skills to supervisors, lead eligibility workers, managers and other staff directly involved in corrective action planning. The basic format is modified to meet the needs of the individual County. Refer to Part I, Section 2, of this Plan for further information about this training.

During this review period, the Nine-Step Workshop was presented to members of San Bernardino County's Corrective Action Committee. Also, Bureau staff trained Los Angeles County staff development trainees in conducting this workshop. The Bureau also presented the Quality Control/Accuracy Improvement Awareness Training to approximately 200 eligibility staff in Alameda County.

In addition to participating in training to hone their problem solving skills, staff of California Counties also enhance their error reduction capabilities by working together in regional networking groups. Section 3 of Chart 15 lists Counties that participate in these regional networks. Participation here allows Counties to gain information, discuss mutual concerns, and share solutions to common problems. Currently there are seven networking groups throughout the State: the Northern Counties Corrective Action Committee, the Mother Lode Corrective Action Committee, the Bay Area QC Committee, Southern Counties AFDC Task Force, the Southern Counties Quality Control/Corrective Action Subcommittee, the Southern Counties Food Stamp Task Force, and the Valley Nine Network. Staff from the Operations Improvement Bureau and other bureaus within the State Department of Social Services frequently attend these meetings to share information and lend their support.

County line staff also network through participation in regional conferences. Operations Improvement Bureau staff assist County regional groups in presenting five conferences each year. The Bay Area Counties Eligibility Workers Conference was held in September 1991 and the Northern/Mother Lode Counties Eligibility Workers Conference was held in May 1991. The Southern Counties Supervisors Conference was held in June 1991 and their Eligibility Workers Conference was held in October 1991. The fifth conference, a Supervisors Conference sponsored by the Valley Nine Network was held in March 1991.

These regional conferences provide line staff with the opportunity to share common concerns, discuss corrective action ideas, and acknowledge their key role in California's error reduction efforts.

The Operations Improvement Bureau Clearinghouse is another vehicle for sharing error reduction ideas. Corrective action products and tools are described in the Clearinghouse Catalog and are made available to Counties and other organizations upon request. Section 4 of Chart 17 lists the 23 Counties which requested products directly from the Clearinghouse during the April through September 1991 period. Operations Improvement Bureau consultants also made Clearinghouse products available to Counties as part of the consulting process. For more information on the Clearinghouse, see "Overview of State Accuracy Improvement Activities" in Part I of this Plan.

In sum, California's error reduction efforts are broad based. The common thread running through all these activities is an emphasis on assisting County staff in acquiring the skills, tools and motivation required for accurate casework.

CHART 17  
COUNTY SUMMARY  
April - September 1991

1. Counties are categorized by AFDC caseload size as follows:

Large QC Counties (More than 15,000 AFDC cases)

Alameda	Orange	San Diego
Fresno	Riverside	San Joaquin
Kern	Sacramento	Santa Clara
Los Angeles	San Bernardino	

Medium QC Counties (4,001 - 15,000 AFDC cases)

Butte	San Francisco	Sonoma
Contra Costa	San Mateo	Stanislaus
Imperial	Santa Barbara	Tulare
Merced	Shasta	Ventura
Monterey	Solano	

Small QC Counties (1,400 - 4,000 AFDC cases)

Humboldt	Mendocino	Santa Cruz
Kings	Placer	Yolo
Madera	San Luis Obispo	Yuba

Self-Monitoring (Non-QC) Counties (less than 1,400 AFDC cases)

Alpine	Lake	Plumas
Amador	Lassen	San Benito
Calaveras	Marin	Sierra
Colusa	Mariposa	Siskiyou
Del Norte	Modoc	Sutter
El Dorado	Mono	Tehama
Glenn	Napa	Trinity
Inyo	Nevada	Tuolumne

2. Counties with corrective action committees:

Alameda	Mendocino	San Luis Obispo
Butte	Monterey	Santa Barbara
Contra Costa	Napa	Santa Clara
El Dorado	Orange	Santa Cruz
Fresno	Placer	Shasta
Humboldt	Riverside	Sonoma
Imperial	Sacramento	Solano
Kern	San Bernardino	Stanislaus
Kings	San Diego	Sutter
Lake	San Francisco	Tulare
Los Angeles	San Joaquin	Ventura
Madera		Yolo

3. Counties participating in regional networking groups:

Valley Nine Network

Fresno	Madera	San Joaquin
Kern	Mariposa	Stanislaus
Kings	Merced (not participating)	Tulare

Bay Area QC Committee

Alameda	Sacramento	Santa Clara
Contra Costa	San Benito	Santa Cruz
Marin	San Francisco	Solano
Monterey	San Mateo	Sonoma
Napa		Yolo

Mother Lode Corrective Action Committee

Alpine	El Dorado	Sierra
Amador	Mariposa	Sutter
Butte	Nevada	Tuolumne
Calaveras	Placer	Yuba
Colusa		

Northern Counties Corrective Action Committee

Butte	Lake	Shasta
Del Norte	Lassen	Siskiyou
Glenn	Mendocino	Tehama
Humboldt	Plumas	Trinity

Southern Counties Quality Control/Corrective Action Subcommittee

Imperial	Orange	San Luis Obispo
Inyo	Riverside	Santa Barbara
Kern	San Bernardino	Ventura
Los Angeles	San Diego	

Southern Counties Food Stamp Task Force

Imperial	Riverside	San Luis Obispo
Kern	San Bernardino	Santa Barbara
Los Angeles	San Diego	Ventura
Orange		

4. Counties requesting products from the Corrective Action Bureau Clearinghouse:

Calaveras	Mariposa	Santa Clara
Colusa	Marin	Santa Cruz
Del Norte	Monterey	Siskiyou
El Dorado	Orange	Tehama
Fresno	Riverside	Ventura
Lassen	Sacramento	Yolo
Los Angeles	San Bernardino	Yuba
Madera	San Francisco	